

August 26, 2021

Bryan Easter Heather Easter Bryan Easter for Trustee 2020

Via Email:

Warning Letter Re: FPPC No. 2021-00228, Bryan Easter for Trustee 2020, Bryan Easter, and Heather Easter

Dear Mr. Easter and Ms. Easter:

The Enforcement Division of the Fair Political Practices Commission enforces the provisions of the Political Reform Act (the "Act"). In response to the Enforcement Division's pre-election outreach efforts, we were made aware by the Kern County Elections Office that you and Bryan Easter for Trustee 2020 (the "Committee") failed to timely file a pre-election campaign statement in connection with the November 3, 2020 General Election. The Enforcement Division has completed its review and found that the Committee also failed to timely file two 24-hour contribution reports.

The Act requires candidate-controlled committees that receive a contribution, including a loan, of \$1,000 or more from a single source within 90 days before the election to file a 24-hour report within 24 hours of receipt of the contribution.²

Your actions violated the Act because you failed to file two 24-hour contribution reports for a non-monetary contribution of \$4,000 received on October 1, 2020, and a loan of \$1,500 received on October 13, 2020. However, the Enforcement Division has decided to close this violation with a warning letter because as a first-time candidate, you were not aware that the 24-hour filing obligation applies to all contributions, monetary and non-monetary, and that loans are considered contributions. You also received incorrect advice regarding this matter. Additionally, both contributions were disclosed on the second pre-election campaign statement. Moreover, the

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014, and all statutory references are to this code. The regulations of the Fair Political Practices Commission are contained in Sections 18110 through 18997 of Title 2 of the California Code of Regulations, and all regulatory references are to this source.

² Sections 82036 and 84203.

Committee was terminated as of November 30, 2020, and neither you nor the Committee have a history of violating the Act.

This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on newly discovered information or future conduct. Failure to comply with the provisions of the Act in the future will result in monetary penalties of up to \$5,000 for each violation.

A warning letter is an Enforcement Division case resolution without administrative prosecution or fine. The Commission has adopted Regulation 18360.1 to authorize the Enforcement Division to issue warning letters to conclude cases in specified circumstances. However, the warning letter resolution does not provide you with the opportunity for a probable cause hearing or hearing before an Administrative Law Judge or the Commission. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten (10) days from the date of this letter. Upon this notification, the Enforcement Division will rescind this warning letter and proceed with administrative prosecution of this case. If we do not receive such notification, this warning letter will be posted on the Commission's website ten (10) days from the date of this letter.

If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772 or visit our website at www.fppc.ca.gov.

Please feel free to contact Dominika Wojenska at dwojenska@fppc.ca.gov or (916) 322-2043 with any questions you may have regarding this letter.

Sincerely,

Angela J. Brereton Angela J. Brereton, Chief

Enforcement Division

AJB/dw